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Of Attorneys for Plaintiff Coty Richardson

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

COTY RICHARDSON,

Plaintiff,

vs.

NORTHWEST CHRISTIAN UNIVERSITY,
an Oregon Corporation,

Defendant.

No. 6:15-cv-01886-AA

**DECLARATION OF DANIEL KALISH
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT**

DECLARATION OF DAN KALISH IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PARTIAL SUMMARY JUDGMENT- 1
(No. 6:15-cv-01886-AA)

HKM Employment Attorneys LLP
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1. I, Dan Kalish, represent the plaintiff Coty Richardson in the above-entitled action. I am over age of 18 and I am competent to testify about the matter stated herein.

2. Attached as **Exhibit A** are true and correct copies of various documents provided by defendant Northwest Christian University (“NCU”) in discovery.

3. Attached as **Exhibit B** is a true and correct copy of “Defendant’s Response to Plaintiff’s First Set of Interrogatories.”

4. Attached as **Exhibit C** is a true and correct copy of *In the Matter of WAL-MART STORES EAST, INC. dba Wal-Mart*, 22 BOLI 27 (July 13, 2001).

5. Attached as **Exhibit D** is a true and correct copy of portions of the Deposition of Dr. Heike McNeil taken on April 29, 2016.

6. Attached as **Exhibit E** is a true and correct copy of portions of the Deposition of Coty Richardson taken on April 25, 2016.

7. Attached as **Exhibit F** is a true and correct copy of portions of the Deposition of Dr. Joseph Womack taken on April 26, 2016.

8. Attached as **Exhibit G** is a true and correct copy of portions of the Deposition of Dr. Dennis Lindsay taken on April 28, 2016.

9. Attached as **Exhibit H** is a true and correct copy of portions of the Deposition of Gene De Young taken on April 27, 2016.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Dated this 25th day of October, 2016 at Seattle, Washington.

s/Daniel Kalish

Daniel Kalish

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury of the laws of the United States of America and the State of Oregon that on October 25, 2016, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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Attorneys for Defendant

Dated this 25th day of October, 2016.

s/Lara Flores

Lara Flores

DECLARATION OF DAN KALISH IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PARTIAL SUMMARY JUDGMENT- 4
(No. 6:15-cv-01886-AA)

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